

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

IN RE: ZIMMER NEXGEN KNEE)
IMPLANT PRODUCTS LIABILITY) MDL NO. 2272
LITIGATION)
)
This Document Relates to:) Master Docket Case No. 1:11-cv-05468
)
Cheryl Gustafson, et al. v. Zimmer, Inc.,)
et al., 1:11-cv-05746) Honorable Rebecca Pallmeyer
)

**STIPULATION TO ZIMMER ENTITIES'
MOTION FOR SUGGESTION OF REMAND**

The defendants, Zimmer, Inc., Zimmer Holdings, Inc. and Zimmer Orthopaedic Surgical Products, Inc. (collectively, "Zimmer"), filed the Zimmer Entities' Motion For Suggestion Of Remand on February 10, 2012. The plaintiffs, Cheryl Gustafson and Cory Gustafson ("Plaintiffs"), stipulate to remand of the above-captioned matter to its originating jurisdiction, the District of Minnesota.

The plaintiffs, therefore, join with Zimmer in the Zimmer Entities' Motion For Suggestion Of Remand and stipulate that the Court should file a Suggestion of Remand for this action with the Judicial Panel on Multidistrict Litigation.

WHEREFORE, the plaintiffs respectfully request that the Court file a Suggestion of Remand for this action with the Judicial Panel on Multidistrict Litigation.

Dated: February 21, 2012

Respectfully Submitted,

ROBINS, KAPLAN, MILLER & CIRESI

By: /s/ Holly H. Dolejsi
Vincent J. Moccio (MN Bar #184640)
Holly H. Dolejsi (MN Bar #0390110)
2800 LaSalle Plaza
800 LaSalle Avenue
Minneapolis, MN 55402-2015
Telephone: (612) 349-8500
Fax: (612) 339-1181